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32 Attorneys for Defendant: Otto Trucking LLC

33 **UNITED STATES DISTRICT COURT**

34 **NORTHERN DISTRICT OF CALIFORNIA – SAN FRANCISCO DIVISION**

35 WAYMO LLC,

36 Case No. 3:17-cv-00939-WHA

37 Plaintiff,

38 v.
39 **DECLARATION OF TODD A. BOOCK IN
40 SUPPORT OF DEFENDANT OTTO
41 TRUCKING LLC'S ADMINISTRATIVE
42 MOTION TO FILE UNDER SEAL**

43 UBER TECHNOLOGIES, INC.;
44 OTTOMOTTO LLC; OTTO TRUCKING
45 LLC,

46 Courtroom: 8, 19th Floor
47 Judge: Hon. William H. Alsup

48 Defendants.

49 Filed/Lodged Concurrently with:

- 50 1. Admin. Mot. to File Documents Under Seal
- 51 2. [Proposed] Order
- 52 3. Redacted/Unredacted Versions
- 53 4. Proof of Service

1 I, Todd A. Boock, declare as follows:

2 1. I am counsel at the law firm of Goodwin Procter LLP, counsel of record for
 3 Defendant Otto Trucking LLC (“Otto Trucking”). I make this declaration based upon matters
 4 within my own personal knowledge and if called as a witness, I could and would competently
 5 testify to the matters set forth herein. I make this declaration in support of Defendant Otto
 6 Trucking’s Administrative Motion to File Under Seal Portions of its Reply Supporting Its Motion
 7 to Compel Further Discovery re: Waymo’s Investigation [Dkt. 2035] and exhibits thereto (the
 8 “Administrative Motion”).

9 2. I have reviewed the following documents and confirmed that only the portions
 10 identified below merit provisional sealing:

Document	Portions to Be Filed Under Seal	Parties Claiming Confidentiality
Otto Trucking’s Reply	Highlighted portions	Plaintiff
Exhibit 2 to the Boock Declaration	Entire document	Plaintiff
Exhibit 3 to the Boock Declaration	Entire document	Plaintiff

17 3. The entirety of Otto Trucking’s Reply and Exhibits 2 and 3 contain information
 18 that Plaintiff Waymo LLC (“Waymo”) has designated “Confidential” or “Highly Confidential –
 19 Attorneys’ Eyes Only” pursuant to the Protective Order in this case. Otto Trucking states no
 20 position about whether the confidentiality designations are appropriate, except to object to the
 21 designation of Exhibit 2 as noted in Otto Trucking’s Administrative Motion to File Under Seal.
 22

23 4. Otto Trucking anticipates that Waymo will file any necessary declarations to seal
 24 the above information pursuant to Local Rule 79-5.

25 5. Otto Trucking’s request to seal is narrowly tailored to those portions of Otto
 26 Trucking’s Motion and its supporting documents that merit sealing.

1 I declare under penalty of perjury under the laws of the United States that the foregoing is
2 true and correct. Executed this 30th day of October, 2017 in Los Angles, California.
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4

/s/ Todd A. Boock

Todd A. Boock

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CERTIFICATE OF SERVICE

I hereby certify that I electronically filed the foregoing document including all of its attachments with the Clerk of the Court for the United States District Court for the Northern District of California by using the CM/ECF system on **October 30, 2017**. I further certify that all participants in the case are registered CM/ECF users and that service of the publicly filed documents will be accomplished by the CM/ECF system.

I certify under penalty of perjury that the foregoing is true and correct. Executed on
October 30, 2017.

/s/ Todd A. Boock
TODD. A BOOCK